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COUNSEL FOR RPS GROUP, INC.

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

IN RE:	§	CHAPTER 7
	§	
JUPITERMLP, LLC,	§	
<i>Debtor.</i>	§	CASE NO. 19-32800-SGJ-7
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DANIEL J. SHERMAN, CHAPTER 7 TRUSTEE,	§	
<i>Plaintiff,</i>	§	
	§	
v.	§	ADV. NO. 22-03018-SGJ
	§	
RPS GROUP, INC.,	§	
	§	
<i>Defendant.</i>	§	

**AGREED MOTION TO ABATE PRE-TRIAL DEADLINES
AND ANY FURTHER
SCHEDULING FOR DOCKET CALL AND TRIAL**

COME NOW, Daniel J. Sherman, Chapter 7 Trustee, (the “Trustee”) and RPS Group, Inc. (the “Defendant” or “RPS”) and file their Agreed Motion to Abate Pre-Trial Deadlines and any Further Scheduling of Docket Call and Trial (“Agreed Motion”) and for such would show the Court as follows:

1. The Trustee and RPS file this Agreed Motion requesting that the Court postpone the trial setting and pre-trial deadlines until after the parties have completed their discussions and voluntary exchanging of documents in connection with payments made by the Debtor to RPS.

2. Trustee has identified certain transfers to RPS, and has been unable to locate any documentation which substantiates either that the transfers represent a payment made in the ordinary course of business or that the Debtor received reasonably equivalent value for the transfers to the Defendant.

3. The Trustee believes that such transfers were on account of obligations owed by third party entities and that the Debtor received no value for such transfers, and the parties are working to locate documents relating to the transfers.

4. Under the February 1, 2022 Scheduling Order [Docket No. 3], this case is set for trial the week of July 18, 2022, with the Docket Call being set for July 11, 2022 at 1:30 p.m.

5. In order to avoid the time and expense of litigation, including preparation for trial, and to conserve judicial resources, the parties have engaged in ongoing discussions and voluntary exchanging of documents, and the parties have agreed to ask the Court to postpone the current trial setting and pretrial deadlines until after their discussions and exchanging of documents has been completed and resolved. Specifically, the parties request that the current trial setting and all pretrial deadlines, beginning May 23, 2022, be abated.

For the foregoing reasons, by agreement, the Trustee and RPS request that the Court enter the proposed Agreed Order to Abate Pre-Trial Deadlines and any Further Scheduling of Docket Call and Trial.

DATED: July 8, 2022

Respectfully submitted,

/s/Jeffrey R. Seckel [2022-07-08]

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/s/Jason A. Enright [2022-07-08]

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CERTIFICATE OF SERVICE

The undersigned certifies that on July 8, 2022, a true and correct copy of the foregoing document was electronically mailed to the parties that are registered or otherwise entitled to receive electronic notices in this case pursuant to the Electronic Filing Procedures in this District.

/s/Jeffrey R. Seckel [2022-07-08]

Jeffrey R. Seckel